



October 14, 2021

VIA ECF

The Honorable P. Kevin Castel, U.S.D.J.  
Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Rodriguez*, 1:15-cr-00778-PKC

Dear Judge Castel:

On May 1, 2020, I was appointed as CJA counsel to file a motion for compassionate release for Alex Rodriguez, an inmate at FCI Lewisburg. On May 7, 2020, Fern Mechlowitz, a Senior Associate and fulltime employee at my firm, was approved to work for up to 20 hours at a rate of \$110, *nunc pro tunc* to my appointment, to assist in preparing a compassionate release motion on Mr. Rodriguez's behalf. See Dkt. No. 207. We worked together to fully brief a compassionate release motion on Mr. Rodriguez's behalf, which we ultimately withdrew because Mr. Rodriguez was released by the Bureau of Prisons ("BOP") pursuant to the Cares Act. At the time that we withdrew our motion and submitted a CJA voucher, Ms. Mechlowitz had reached the allotted 20 hours of time because Mr. Rodriguez suffered from a number of serious medical issues, and it was necessary for her to research his extensive medical history and how his medical conditions impacted his vulnerability to COVID-19.

After Mr. Rodriguez was released by the BOP and placed on home confinement, Mr. Rodriguez experienced a number of new medical complications. He also had great difficulty with the system devised by the residential reentry center that was supervising him and would not always receive approval to attend his medical appointments. Because the difficulties Mr. Rodriguez was experiencing in obtaining approval to timely attend medical appointments seriously compromised his health, it became necessary for us to intervene with the residential reentry center, the BOP and the U.S. Attorney's Office to try to obtain relief for Mr. Rodriguez, which was a time intensive process. Ms. Mechlowitz, who had deep knowledge of Mr. Rodriguez's medical conditions and spent a significant amount of time advocating for Mr. Rodriguez, drafted a renewed motion for compassionate release on Mr. Rodriguez's behalf (along with two letters to the Court detailing his medical issues), which was ultimately granted by this Court. See Dkt. No. 240. We therefore respectfully request that the Court grant an additional 43.1 hours of associate time, *nunc pro tunc* to the submission date of our first voucher, May 29, 2020, for Ms. Mechlowitz's time. Thank you for your consideration.

Sincerely,

/s/ Kristen M. Santillo

Kristen M. Santillo

Application  
granted.  
COORDINATOR  
VSDJ  
10-14-21